

UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF TEXAS  
MARSHALL DIVISION

ADVANCED MEMORY TECHNOLOGIES,  
LLC,

Plaintiff,

v.

SK HYNIX INC.,

Defendant.

Civil Action No.: 2:24-cv-01078-JRG-RSP

**JURY TRIAL DEMANDED**

**UNOPPOSED MOTION FOR EXTENSION OF TIME TO MOVE, ANSWER OR  
OTHERWISE RESPOND TO PLAINTIFF'S COMPLAINT AND WAIVER OF  
FOREIGN SERVICE REQUIREMENT**

Defendant SK hynix Inc. (“SK hynix” or “Defendant”), without waiving any defenses described or referred to in Rule 12 F.R.C.P., moves the Court to extend the time within which Defendant is required to move, answer, or otherwise respond to Plaintiff’s Complaint. In support of its Motion, Defendant states as follows:

1. On December 30, 2024, Plaintiff filed its Complaint alleging patent infringement against SK hynix.
2. Counsel for Defendant has agreed to waive service under the Hague Convention for Defendant in exchange for a 90-day extension of the time to answer or otherwise plead by April 28, 2025.
3. Defendant’s agreement with Plaintiff should not be construed as a waiver of any other rights or defenses, including, for instance, Defendant’s right to file counterclaims, affirmative defenses, or to otherwise challenge the validity of the subject patents.

WHEREFORE, Defendant respectfully requests that the time in which it is required to move, answer, or otherwise respond to Plaintiff's Complaint be extended to and including April 28, 2025.

DATED: January 27, 2025

Respectfully submitted,

By: /s/ Kevin Jang  
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*Counsel for SK hynix Inc.*

**CERTIFICATE OF SERVICE**

The undersigned hereby certifies that counsel of record who are deemed to have consented to electronic service are being served with a document of this document via the Court's CM/ECF system per Local Rule CV-5(a)(3) on January 27, 2025.

*/s/ Kevin Jang*  
Kevin Jang

**CERTIFICATE OF CONFERENCE**

The undersigned hereby certifies that counsel for Defendant met and conferred with counsel for Plaintiff. Counsel for Plaintiff indicated that it is unopposed to this motion.

*/s/ Kevin Jang*  
Kevin Jang